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November 13, 2024

VIA ECF

Honorable Richard M. Berman United States District Court Southern District of New York Daniel Patrick Moynihan Courthouse 500 Pearl Street, Courtroom 17B New York, NY 10007

Re:

USA v. Klein, 1:18-CR-00711-RMB

Dear Hon. Judge Berman:

I write with the consent of the government to request a modification to Mr. Klein's bail conditions.

Procedural History

Mr. Klein has appeared on this matter numerous times since his arrest in 2018. His conditions of release were originally set on October 11, 2018. ECF No. 7. Those conditions included the requirement that Mr. Klein execute a \$500,000 appearance bond secured by his residence, and that he surrender his passport, amongst others. Id. On September 21, 2023, the Court granted Mr. Klein's request to replace the \$500,000 appearance bond with a \$100,000 personal recognizance bond. See ECF No. 64.

On July 29, 2019, Mr. Klein entered a plea of guilty before Magistrate Judge Ona T. Wang. Sentencing is currently scheduled for May 6, 2025. ECF No. 72

Request for Modification of Bail Conditions

As noted, Mr. Klein's conditions of release require that he surrender his passport. As such, Mr. Klein's passport, which expires in January of 2025, is currently in the possession of U.S. Pretrial Services for the District of New Jersey.

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On consent, I respectfully request that the Court modify the terms of Mr. Klein's bail conditions to allow that his passport be released to his attorneys at Hecker Fink LLP. If the request is granted, and as discussed with the government, I will coordinate with Mr. Klein to help him renew his passport. Once Mr. Klein's passport is renewed, I will retake possession of the passport.

Pretrial Services has indicated that Mr. Klein has remained in compliance with his conditions of reporting and takes no position to this request.

We appreciate the Court's consideration and are available to discuss, should the Court have any questions.

Respectfully submitted,

Sean Hecker

Modification consent.	granted on
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	chard M. Berman U.S.D.J.